

Summary of State Historic Preservation Office Replies to DAS & Small Cell Questions

The following excerpted comments are from responses to an e-mail survey sent to State Historic Preservation Offices (SHPOs) in July 2012 and follow-up telephone conversations with some of the respondents. As indicated below, in a few instances information was gleaned from other sources. Names and references that link comments to specific states have been redacted; however a list of states responding is included.

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- “We have received and responded to requests to review DAS (called Nodes by the consultants asking for our review), but not many. . . . Because the DAS we looked at were in NRHDs [National Register Historic Districts], I asked a lot of questions to understand what they were all about - the equipment and utility tie-in, etc. From the plans and photos provided to educate me, I was able to do findings of No Adverse Effect for the two DASs (although they did have to move from one pole to another since their original pole would have been an in your face adverse effect at their first choice). And, with your additional info about the close connection with utility r-o-w [right-of-way], they now make more sense.”

“In my experience, I'd likely opt for using the nationwide PA for collocations. The DASs seem to fit the PA pretty well. And, with a little more education of SHPOs on what DASs are and how they look, I think others would agree. The key would be to get a handle on the various models of DASs and the fact that a slight adjustment in location/to another nearby pole is much more easily done.

I think that the SHPO reviewers understanding what DASs really are would help the sale of the Collocation for them.”

- Interview with [REDACTED]: Respondent was unaware of DAS installations, but based on the information provided DAS believed they should be treated as collocations. Emphasized that the SHPO reserved the right to review DAS if in historic districts. Concerned with the work implications of using the 621 forms.
- “I will check with our R&C staff and request their input.” Indicated there would be a response to the other questions. No response provided, three calls made.
- “I sent the email around to the office, and everyone thought the DAS system was a no adverse effect. I don't think we would want to spend valuable 106 time reviewing them.
- The cases in which they would even be noticed would be extremely small as long as you are using poles that are already there.”

- “The [REDACTED] SHPO has not received any requests to comment on DAS systems.” Follow up indicated the office had in fact received requests and treated them under the collocation agreement.
- “Although we haven't reviewed any DAS projects that consist of mounted antennas onto exiting utility poles, it appears that the FCC Collocation would be the best fit for these, and most would likely be exempt from Section 106 review.”
- “It is our intent at this point to consider this submission under the National Programmatic Agreement ‘rules,’ as this project appears to be nodes on structures/poles that are entirely new. If a DAS plan will attach the antenna to existing light or existing poles or other structures we intend to follow the Collocation Agreement, because that seems to meet the definition of collocation. This is our plan until instructed otherwise by the Federal Communication Commission, or the Advisory Council on Historic Preservation, or both. We look forward to seeing what other states are doing.”
- Interview with [REDACTED]: Not immediately aware of any DAS installations – seemed to confuse DAS with roof top antenna. When differences explained, SHPO was of the opinion that DAS should be treated as a collocation – Observed that [REDACTED] would not care about what happened on utility poles unless those poles were within a historic district.
- “Yes, the [REDACTED] has reviewed a number of DAS projects in our state. Yes, we use the existing nationwide PA. None of the DAS installations to date have had an adverse effect on any historic properties.”
- “[REDACTED] has not received any projects of this sort for review.” Follow up e-mails and calls produced no response to other questions
- “We have received only one submission with 12 locations in [REDACTED]. We reviewed as a collocation.” Follow up showed that SHPO staff was confusing DAS with rooftop mounts. Based on information provided it felt most DAS installations would be reviewed under the Collocation Agreement.
- “The term ‘DAS’ is not coming up in our database, and our review staff does not remember seeing that term on any of the FCC forms we have received. . . . “Based on the information in your e-mail, we do not think there would be many situations where DAS would pose problems for historic properties here. Hopefully, this technology can be incorporated into the current FCC nationwide. It seems to us that the biggest potential for impacts would come from placing new poles in areas where archeological sites could exist.”
- “To date, our office has not been asked to review these projects, either because none have been proposed, or because none have been submitted for our review. If we were to receive such a project, we would review it with reference to the FCC PA's.” In follow up interview, some concern was expressed about the “paperwork” implications of using the existing PA's.

- “From the attached .pdf, it appears that the effects will [be] minimal, just more visual clutter where it already exists. However, we think the construction of new short stealth poles as seen in a couple of photos, is not the same as collocation units on existing utility poles. . . . “We would want to review an installation project as a whole (if installing on 50 utility poles, or installing 50 new poles, we’d prefer to be sent in on one form, not 50 separate ones).”
- “We would generally be supportive of these types of installations as opposed to the traditional towers we’ve been seeing. These are much lower profile.”

“We would mostly be concerned about impacts within historic districts and on historic structures, including water towers and street lights.”

“We would welcome the opportunity to review these as systems rather than individual sites, but we would need a new approach. We would still need to see some depiction of where they would be placed, with representative pictures of the structures being used, map[s] showing system corridors/area, and pictures of any historic-age structure being used (except standard telephone poles, if any do exist that are of historic age).”

- “We have only had two projects which involved multiple nodes. I’m not sure the first one even used a DAS system because nowhere in the application was that term referenced. Since they were collocating these antennas on existing poles, this project was treated as a collocation using the Nationwide Programmatic Agreement for the Collocation of Wireless Antennas.

“The other project did use DAS. Since it involved building new poles to support the antennas, this project was treated as a new tower submission using the Nationwide Programmatic Agreement for cell towers. It has been about two years since this project was submitted, and I have not seen any more DAS projects.”

“I did not see any problem with the existing forms.”

- “In response to your inquiry, I am not aware of any DAS projects being submitted for Section 106 review in [REDACTED].”
- No direct response from two SHPOs, but positions available in other sources.
 - “The [REDACTED] State Historic Preservation Office (SHPO) recommends that Certified Local Government (CLG) historic boards use two federal documents when reviewing Federal Communications Commission (FCC) wireless antenna projects [including DAS] located in historic districts:
 - Nationwide Programmatic Agreement for Collocation of Wireless Antenna . . .
 - Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission.”

- “Installation of a cellular communications antenna or other device on a (non-communication tower) building or structure (*e.g.* water tower, high tension utility tower, church steeple, barn, silo, etc.)
 - Despite industry terminology, the SHPO does not consider this activity to be a ‘co-location’
 - This activity may result in physical or visual impacts to historic resources. Consideration must also be given to the impacts this type of undertaking could have on the surrounding environment, particularly when the this building or structure is located within an historic district.”
- No response, but SHPO’s treatment of DAS shown in actions. “The State Historic Preservation Office opined the proposed DAS would not have an adverse effect [on a highway] . . . [and] recommended [REDACTED] establish a fund in the amount of \$50,000 per year for every year the DAS is in operation, to be administered by [REDACTED] for the sole purpose of restoring and maintaining the scenic and historic qualities”
- “To date, the [REDACTED] Historic Preservation Office has not reviewed any DAS projects. In [REDACTED] collocations have occurred on buildings or structures, or brand new cell towers. Should we receive a request for such review, it is our intention to use the FCC collocation agreement.”

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SHPO Offices Replying to Questions or for which information on DAS and small cell policy could be obtained from other sources:

1. Alabama
2. Arizona
3. California
4. Connecticut
5. Florida
6. Illinois
7. Indiana
8. Massachusetts
9. Michigan
10. Minnesota
11. New York
12. North Carolina
13. North Dakota
14. Ohio
15. Oklahoma
16. Oregon
17. South Carolina
18. Texas
19. Vermont
20. Virginia
21. Washington
22. Washington, D.C.
23. West Virginia